

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

OURPET'S COMPANY,)	CASE NO. 1:15-cv-2077
)	
Plaintiff,)	
)	
vs.)	
)	JUDGE PATRICIA A. GAUGHAN
VAN NESS PLASTICS MOLDING CO.,)	
INC.,)	
)	
Defendant.)	
)	

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

On October 7, 2015, Plaintiff OurPet's Company ("OurPet's") filed its Complaint [Doc. #1], against Defendant Van Ness Plastics Molding Co., Inc. ("Van Ness"). The Complaint was served on October 19, 2015, making Van Ness' response to OurPet's Complaint due November 9, 2015. Prior to that date, Defendant Van Ness' counsel Thomas A. O'Rourke contacted Plaintiff OurPet's counsel, and the parties agreed to a 30 day extension of time. Now, Defendant Van Ness, by and through its undersigned counsel, respectfully moves this Court for a thirty (30) day extension of time, up to and including December 9, 2015, in which to answer, plead, move or otherwise respond to OurPet's Complaint. OurPet's does not oppose this Motion or this request for an extension of time to respond to the Complaint.

This Motion is not meant for purposes of delay, but is at the request of Defendant's counsel to allow additional time for further investigation of the factual and

legal bases of the patent infringement claims alleged in the Complaint which is necessary to prepare a fully responsive pleading. Thus, for good cause shown, Defendant Van Ness respectfully requests that the Court grant an extension of time up to and including December 9, 2015 to answer, plead, move or otherwise respond to the Complaint.

Respectfully submitted,

Dated: November 24, 2015

/s/ John T. Wiedemann

John T. Wiedemann, Esq. (0065844)
CALFEE, HALTER &
GRISWOLD LLP
1405 East Sixth Street
The Calfee Building
Cleveland, Ohio 44114
Phone: 216-622-8200
Fax: 216-241-0816
E-Mail: jwiedemann@calfee.com

Thomas A. O'Rourke (*pro hac vice*
pending)

BODNER & O'ROURKE, LLP
425 Broadhollow Road
Suite 120
Melville, New York 11747
Phone: (631) 249-7500
Fax: (631) 249-4508
Email: torourke@bodnerorourke.com

**Attorneys for Defendant Van Ness
Plastics Molding Co., Inc.**

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2015, a copy of the foregoing was filed electronically.

Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Parties may access this filing through the Court's CM/ECF system.

/s/ John T. Wiedemann
One of the Attorneys for

**Defendant Van Ness Plastics
Molding Co., Inc.**